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Attorneys for Plaintiff,
SIX4THREE, LLC, a Delaware
limited liability company

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

SIX4THREE, LLC, a Delaware limited
liability company,

Plaintiff,

v.

FACEBOOK, INC., a Delaware corporation,
and DOES 1 through 50, inclusive

Defendants.

Case No. 3:17-cv-00359-WHA

DECLARATION OF DAVID GODKIN
IN SUPPORT OF MOTION TO
REMAND

1 I, David Godkin, declare:

2 1. I am a partner in the law firm Birnbaum & Godkin, LLP and am counsel for
3 six4three, LLC (“643”) in the above-captioned action. I have been admitted *pro hac vice* in this
4 case.

5 2. I submit this Declaration in satisfaction of Civil L.R. 7-2 and 7-5.

6 3. A true and correct copy of 643’s Second Amended Complaint in the California
7 Superior Court, County of San Mateo, is attached as Exhibit 1.

8 4. A true and correct copy of the Order on Demurrer in the California Superior
9 Court, County of San Mateo is attached as Exhibit 2.

10 5. A true and correct copy of 643’s Response to Defendant’s Specially Prepared
11 Interrogatories (Set Two) is attached as Exhibit 3.

12 6. A true and correct copy of the Notice of Removal received on January 24, 2017 is
13 attached as Exhibit 4.

14 7. A true and correct copy of my email to Facebook’s counsel responding to the
15 Notice of Removal is attached as Exhibit 5.

16 8. A true and correct copy of Facebook counsel’s email to me regarding 643’s
17 interrogatory response is attached as Exhibit 6.

18 9. I declare the foregoing to be true and correct as of the date listed immediately
19 below.
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1 DATED: January 27, 2017

2 By: /s/ David S. Godkin

3 David S. Godkin

4 Attorney for six4three, LLC

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7 **CERTIFICATE OF SERVICE**

8 The undersigned hereby certifies, under penalty of perjury under the laws of the State of
9 California, that I electronically filed the foregoing document with the Clerk of the Court using
10 the CM/ECF system which will send notification of such filing to the following:

11 Sonal N. Mehta
12 Laura E. Miller
13 Catherine Y. Kim
14 Durie Tangri LLP
217 Leidesdorff Street
San Francisco, CA 94111

15 DATED: January 27, 2017

16
17 By: /s/ David S. Godkin

18 David S. Godkin